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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91214541
Party	Defendant Sylvia Greif
Correspondence Address	INGMAR SNIJDERS BRATSCHI WIEDERKEHR & BUOB BAHNHOFSTRASSE 70 CH-8001 ZÜRICH, SWITZERLAND
Submission	Answer
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Signature	/Oren Gelber/
Date	02/27/2014
Attachments	Q258_Applicant's Answer To Notice Of Opposition_140227.PDF(175380 bytes)

**UNITED STATES PATENT AND TRADEMARK OFFICE
TRADEMARK TRIAL AND APPEAL BOARD**

FACEBOOK, INC.

Opposer,

v.

SYLVIA GREIF

Applicant.

Mark: APB ANIMALPETBOOK AB &
DESIGN

Opp. No.: 91214541

Serial No.: 79117572

Commissioner for Trademarks
Trademark Trial and Appeal Board
PO Box 1451
Alexandria, Virginia 22313-1451

APPLICANT'S ANSWER TO NOTICE OF OPPOSITION

Answering the Notice of Opposition in the above captioned matter, the Applicant,
Sylvia Greif ("Applicant") by and through her attorney responds as follows:

1. Applicant lacks information or belief with regard to the allegations of Paragraph 1 of the Notice of Opposition and therefore denies such allegations.
2. Applicant lacks information or belief with regard to the allegations of Paragraph 2 of the Notice of Opposition and therefore denies such allegations.
3. Applicant admits that Exhibit A appears to include copies of Registrations for the mark FACEBOOK. Applicant denies the remaining allegations of Paragraph 3 of the Notice of Opposition.

4. Applicant lacks information or belief with regard to the allegations of Paragraph 4 of the Notice of Opposition and therefore denies such allegations.
5. Applicant lacks information or belief with regard to the allegations of Paragraph 5 of the Notice of Opposition and therefore denies such allegations.
6. Applicant admits that she sought an extension of protection of her International Registration No. 1128404 in the U.S. resulting in U.S. Trademark Application No. 79117572 for the mark APB ANIMALPETBOOK AB & DESIGN. Applicant submits that U.S. Trademark Application No. 79117572 speaks for itself. Applicant denies the remaining allegations of Paragraph 6 of the Notice of Opposition.
7. Applicant admits that her U.S. Trademark Application No. 79117572 was published on September 17, 2013.
8. Applicant repeats and re-alleges its responses to the allegations of Paragraphs 1 – 7 of the Notice of Opposition.
9. Applicant lacks information or belief with regard to Opposer's allegations of use of the FACEBOOK mark. Applicant lacks information or belief with regard to Opposer's allegations concerning Opposer's applications and federal registrations. Applicant therefore denies the allegations of Paragraph 9 of the Notice of Opposition.
10. Applicant denies the allegations of Paragraph 10 of the Notice of Opposition.
11. Applicant denies the allegations of Paragraph 11 of the Notice of Opposition,
12. Applicant denies the allegations of Paragraph 12 of the Notice of Opposition.
13. Applicant denies the allegations of Paragraph 13 of the Notice of Opposition.
14. Applicant denies the allegations of Paragraph 14 of the Notice of Opposition.
15. Applicant denies the allegations of Paragraph 15 of the Notice of Opposition.

16. Applicant admits that she and her services are not affiliated with or connected to Opposer.
Applicant admits that Opposer has not sponsored or endorsed Applicant or her services.
Applicant denies the remaining allegations of Paragraph 16 of the Notice of Opposition.
17. Applicant admits that Opposer has no control over the nature and quality of Applicant's services.
Applicant denies the remaining allegations of Paragraph 17 of the Notice of Opposition.
18. Applicant denies the allegations of Paragraph 18 of the Notice of Opposition.
19. Applicant repeats and re-alleges its responses to the allegations of Paragraphs 1 – 18 of the Notice of Opposition.
20. Applicant denies the allegations of Paragraph 20 of the Notice of Opposition.
21. Applicant lacks information or belief with regard to the allegations of Paragraph 21 of the Notice of Opposition and therefore denies such allegations.
22. Applicant lacks information or belief with regard to the allegations of Paragraph 22 of the Notice of Opposition and therefore denies such allegations.
23. Applicant lacks information or belief with regard to the allegations of Paragraph 23 of the Notice of Opposition and therefore denies such allegations.
24. Applicant denies the allegations of Paragraph 24 of the Notice of Opposition.
25. Applicant denies the allegations of Paragraph 25 of the Notice of Opposition.
26. Applicant denies the allegations of Paragraph 26 of the Notice of Opposition.
27. Applicant denies the allegations of Paragraph 27 of the Notice of Opposition.
28. Applicant denies the allegations of Paragraph 28 of the Notice of Opposition.

GENERAL DENIAL

Except as expressly admitted herein, Applicant denies each and every allegation contained in the Notice of Opposition, and denies that Opposer is entitled to any relief requested, and therefore demands strict proof thereof.

AFFIRMATIVE DEFENSES

FIRST AFFIRMATIVE DEFENSE

The Notice of Opposition fails to state a claim upon which relief can be granted.

SECOND AFFIRMATIVE DEFENSE

Applicant's mark is not likely to cause confusion with Opposer's pleaded mark.

THIRD AFFIRMATIVE DEFENSE

Applicant's mark is sufficiently different from Opposer's pleaded mark, as applied to its goods, to avoid confusion, deception, or mistake as to the source or sponsorship or association of Applicant's goods.

FOURTH AFFIRMATIVE DEFENSE

Acquiescence.

FIFTH AFFIRMATIVE DEFENSE

Waiver.

SIXTH AFFIRMATIVE DEFENSE

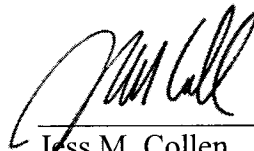
Unclean hands.

SEVENTH AFFIRMATIVE DEFENSE

Opposer's rights do not allow it to prohibit all uses of Marks which employ the term
BOOK in conjunction with Internet activity.

Wherefore, Applicant seeks that the Opposition be dismissed, with prejudice, in favor of
Applicant.

Respectfully submitted,



Jess M. Collen

Oren Gelber

COLLEN *IP*

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Ossining, New York 10562

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Attorneys for Applicant,

Sylvia Greif

Dated: February 27, 2014

JMC/OG:tlj

SHOULD ANY OTHER FEE BE REQUIRED, THE PATENT AND TRADEMARK OFFICE
IS HEREBY REQUESTED TO CHARGE SUCH FEE TO OUR DEPOSIT ACCOUNT 03-
2465.

I HEREBY CERTIFY THAT THIS CORRESPONDENCE IS BEING FILED
ELECTRONICALLY WITH THE UNITED STATES PATENT AND TRADEMARK OFFICE.

Date: February 27, 2014



CERTIFICATE OF SERVICE

I, Troy L. Jordan, hereby certify that I caused a true and correct copy of the following Applicant's Answer to Notice of Opposition to be served upon:

Cooley LLP
1299 Pennsylvania Ave NW, Suite 700
Washington, D.C. 20004
Attention: Lori F. Mayall, Esq

Via first-class mail, postage pre-paid.

Said service having taken place this 27th day of February 2014.

A handwritten signature in cursive script, reading "Troy L. Jordan", is written over a horizontal line. The signature is fluid and extends to the right with a long, sweeping tail.